1	MELINDA HAAG (CABN 132612) United States Attorney
3	MIRANDA KANE (CABN 150630) Chief, Criminal Division
4 5 6 7 8 9	JONATHAN SCHMIDT (CABN 230646) Assistant United States Attorney  450 Golden Gate Ave., Box 36055 San Francisco, California 94102 Telephone: (415) 436-7200 Fax: (415) 436-7234 E-Mail: schmidtjonathand@usdoj.gov  Attorneys for Plaintiff  UNITED STATES DISTRICT COURT
11	NORTHERN DISTRICT OF CALIFORNIA
12	SAN FRANCISCO DIVISION
13	
14	UNITED STATES OF AMERICA, ) No. CR 12-00875 WHA
15	Plaintiff, ) ) STIPULATION AND [Proposed] Order
16	v. ) CONTINUING HEARING DATE AND EXCLUDING TIME
17	JACQUELINE BESSER )
18	Defendant.
19	
20	The parties are scheduled to appear on March 19, 2013. The parties request a
21	continuance of two weeks to April 2, 2013. The parties are in plea discussions and several
22	issues that require detailed review a economic documents have emerged. The parties anticipate
23	that these issues will be clarified by April 2, 2013 and on that date the parties will have reached a
24	plea agreement or ask the Court to set a trial date. The parties also ask that the time between
25	March 19, 2013 and April 2, 2013 be excluded in calculating the time within which a trial must
26	begin. Exclusion of time is appropriate because of the need for the parties to review documents.
27	Failure to exclude time would deny the defendant reasonable time necessary for effective
28	randre to exclude time would delig the detendant reasonable time necessary for effective
	Stip & <del>Proposed</del> Order Excluding Time CR 12-00875 WHA

1	preparation, taking into account the exercise of due diligence. (18 U.S.C. § 3161(h)(B)(7)(iv)).
2	
3	SO STIPULATED
4	Dated: March 18, 2013 MELINDA HAAG United States Attorney
5	Cinica States Attorney
6	S/
7	JONATHAN SCHMIDT Assistant United States Attorney
8	
9	
10	Dated March 18, 2013  S/ MARTHA A. BOERSCH
11	Attorney for Defendant
12	-[Proposed] ORDER
13	
14	GOOD CAUSE APPEARING, the status date set for March 19, 2013 is continued to April 2,
15	2013 and the time from March 19, 2013, to April 2, 2013 is excluded in calculating the time
16	within which a trial must begin. (18 U.S.C. § 3161(h)(B)(7)(iv)).
17	
18	IT IS SO ORDERED
19 20	DATED: March 19, 2013.  WILLIAM H. ALSUP United States District Judge
21	Officed States District Judge
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	Stip & <del>Proposed</del> Order Excluding Time

Stip & Proposed Order Excluding Time CR 12-00875 WHA

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